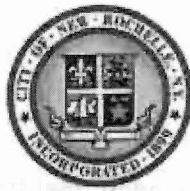


Alexander Tergis
Commissioner



James J. Moran, P.E.
Deputy Commissioner/City Engineer

Scott Pickup
Deputy Commissioner/Operations



**City of New Rochelle
Department of Public Works**

August 27, 2015

Mr. Jerry Ciotola, Environmental Engineer
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency – Region 3
290 Broadway – 20th Floor
New York, New York 10007-1866

RE: Progress on Compliance with Administrative Order CWA-02-2015-3034/Plan of Action

Dear Mr. Ciotola:

Listed below are the efforts the City of New Rochelle has taken towards compliance with the above referenced Administrative Order. In addition, I have provided the current status of the Plan of Action items. I would respectfully request that additional time be allocated to completing all video televising work(Plan of Action second item) since no obvious illicit sanitary connections have been found in the Stephenson Avenue sub basin.

1. Increased the purchase order with the City's consultant engineer (Dolph Rotfeld Engineering, P.C.) and videotaping/cleaning contractor.
2. Conducted kick off and progress meetings with consultant and DPW staff to coordinate compliance.
3. Conducted dry weather flow inspections of all of the system outfalls listed in the order (Outfall Reconnaissance). Please note that Portman Road and Fifth Avenue location is a catch basin that has no connections and only flows into the stormwater system. There was no flow or water in the catch basin.
4. Only two outfalls yielded high coliform readings (Stephenson Avenue/New Rochelle Public Yard and Church Street).
5. Trunk and tributary drain sampling was performed in the Church Street sub drainage system (the smaller of the two systems of concern). These results led to strategic video inspections of pipe sections between manholes in adjacent sanitary sewers. Dye testing was also performed. Some minor structural defects in the sanitary sewer were observed such as cracking and misaligned joints. Also observed was large grease build up in the sewer that constricted the flow area by as much as $\frac{3}{4}$ of the pipe (in some areas). Extensive grease removal and cleaning was conducted to restore pipe capacity. This work is ongoing and resampling will be scheduled to determine the effectiveness of the cleaning.
6. Trunk sampling was performed in the Stephenson (also known as the New Rochelle Public Yard) sub drainage system. As this is the City's largest drainage system, which has a large contributing area and extensive pipe network. Visual inspections at the manholes did not indicate any sources of a discharge or any particular tributary segment. As such, this work cannot be completed by August 31st. The City will continue the video inspection and subsequent dye testing. A new junior engineer has been hired that will assist the City's consultant in the illicit discharge detection and elimination.

Please note that prior to sampling and video inspection, additional funding was required. Reallocation of 2015 fiscal year funding and increases in existing vendor purchase orders were required prior to commencement of any illicit discharge trackdown. With the extend of the investigation in the Stephenson drainage system is unknown at this time, I ask that the Plan of Action item 2(completion of video work) be revised to reflect October 31, 2015.

Please contact me at 914-654-2134 if additional information is required.

Sincerely,



James J. Moran, P.E.
Deputy Commissioner/City Engineer
New Rochelle Public Works

Cc: C. Strome
A. Tergis
E. Dunphy
File